

SBC Midwest Position On CLEC Change Management PM Proposals (#s 151, 152, 157-161)

This document has been developed to communicate SBC Midwest's understanding of the reasoning behind CLEC proposals for Change Management PMs, provide SBC Midwest's perspective on the appropriate manner in which to address those operational concerns, assess the proposals made with regard to the recently re-drafted Change Management Process CR/DR procedures, and discuss what steps SBC Midwest believes are appropriate to address the CLEC concerns.

SBC Midwest Understanding of CLEC Concerns

Based on the discussion held in the Six-Month Review collaborative, SBC Midwest understands the primary concern of CLECs to center upon implementation of system enhancements requests by CLECs. Additionally, SBC Midwest understands CLECs to be concerned with the time it takes to resolve system defects (an OSS implementation that does not comply with the documented requirements provided to CLECs) that impact the CLECs ability to interact with SBC Midwest. SBC Midwest believes CLECs to be of the opinion that SBC Midwest should have specific time frames within which all defects and CLEC change requests should be implemented.

SBC Midwest understands the bottom-line intent of these CLEC PM proposals as being to drive SBC Midwest to implement fixes to DRs more quickly, to implement all CLEC change requests, and to implement CLEC change requests more quickly.

Processes to Drive Operational Change

SBC Midwest is committed to collaborating with CLECs on determining what operational changes or improvements are necessary and appropriate to continuing to provide access to OSS in a meaningful manner to support competition. SBC, across its thirteen states and within SBC Midwest's five states, has committed significant and extensive resources to put the current OSS suite in place, and to regularly collaborate with CLECs on enhancing that OSS suite through the Change Management Process (CMP) documented on CLEC Online.

In June of 2003, the Change Management collaborative initiated a Change Management Process Drafting Team to enhance the then-current Change Management Process through collaborative discussions. All CLECs were invited to participate. CLECs active in this PM collaborative who chose to participate are MCI and AT&T. The issues identified that were to be addressed by that team were the following:

- ? **Changes to the CLEC Operations Support Systems Interconnection Procedures document**
- ? **Billing**
- ? **Tighten and Update the Language in the entire document to reflect the current atmosphere**
- ? **Versioning**
- ? **Tighten prioritization process including how CRs are prioritized**
- ? **Defect Report/Defect Process**
- ? **Change Management Performance Measurements**

Subsequent to the June kickoff session where these topics were agreed-to, eleven separate working sessions were convened, with an additional session scheduled yet in December. In the list of topics above, three directly relate to the issue at hand: Tighten prioritization process including how CRs are prioritized, Defect Report, and Change Management Performance Measurements. SBC representatives to

those working sessions believe that all CLEC concerns with the prioritization process and defect reports were reviewed and discussed, and the resulting near-final draft revised CMP document (as distributed via accessible letter CLECALLS03-227 on December 9, 2003) reflects a consensus joint Drafting Team work product. That document reflects extensive discussions on the prioritization process and defect reports.

Curiously, SBC representatives to the Drafting Team cannot recall any CLEC introducing concepts for measuring the processes being discussed and enhanced in those Drafting Team working sessions, even though performance measurement was one topic the joint Drafting Team was to discuss. Instead, it appears CLECs are choosing to ignore that collaborative process, specifically intended to address issues of concern to CLECs and to mutually agree to new processes and intervals for the Change Management process, and are instead seeking to drive change to the operational process (change that is appropriately discussed and negotiated in the Change Management collaborative and the Drafting Team) through imposition of PMs with standards that do not reflect the negotiated process (specific conflicts between proposed PMs and negotiated processes are discussed with regard to each PM later in this document).

SBC Midwest Assessment of CLEC PM Proposals

Listed below are the titles for each of the PMs included in the CLEC proposals, accompanied by SBC Midwest's assessment of the proposed PM with regard to the Change Management Process as currently defined in the document version distributed via Accessible Letter yesterday.

Percent of Open SBC Midwest CLEC Impacting OSS System/Software Defect Reports (DRs) and Change Requests (CRs) Created Per DRs Resolved within "X" Days

This proposed PM is not consistent with any current process or anything recently agreed to in the modifications to the 13-State Change Management document. There are no requirements in the Change Management Process for "fixing" DRs within any specific number of days. As a result, the "standards" proposed in the PM are arbitrary and do not reflect the agreed-upon process defined through the CMP collaboratives.

Data is available in the Enhanced Defect Report, updated daily on SBC's CLEC OnLine web site, which allows CLECs to assess the timeliness in which DRs are resolved.

Percent of Change Requests Implemented Within 60 Weeks of Prioritization

This PM is not consistent with any current process or any of the modifications recently agreed to in the 13-State Change Management document. SBC Change Management Process SMEs are not aware of any regulatory requirement that any CLEC-requested changes must be implemented.

Data is available in the spreadsheet prepared for CLEC Prioritization of change requests, posted to CLEC OnLine twice each month, which would allow CLECs to determine the timeliness in which prioritized CRs are implemented.

Percent of Change Requests Accepted or Rejected Within 10 days/Percent Change Requests Rejected

This PM is not consistent with any current process or any of the modifications made to the 13-State Change Management document. The modifications made to the 13-State Change Management document state that SBC will acknowledge receipt of a request within 2 business days and either assign a CLEC Change Request (CCR) Log number or advise the originator of the disposition of their request within 7 business days after that. No CLEC recommended any changes to these modifications in the document review session held week of December 1, 2003.

Data is available on the CCR Log that allows CLECs to determine if SBC has acknowledged and then advised the originator of CR disposition within appropriate timelines. The CCR Log is provided to CLECs twice monthly (prior to the monthly Change Management meeting, and again updated with results of that meeting when minutes are distributed). The file is also made available on CLEC OnLine.

Percent of Accepted Change Requests Prioritized within 60 Days of Acceptance

This PM is not consistent with any current process or any of the modifications proposed to the 13-State Change Management document. Additionally, SBC cannot be held accountable in a PM for the timeliness of actions CLECs must take. The PM, as proposed, defines the action that signifies the CR as being prioritized as "when the CR is given a priority rank by the CLECs".

Data is available on the CCR Log and the CLEC Prioritization spreadsheet that allows CLECs to determine if CLECs have prioritized a CR in a timely manner.

Percent of Software Errors Corrected in X (10, 30, 45) Business Days

This PM is not consistent with any current process and was not proposed as part of the modifications to the 13-State Change Management process. There are currently no requirements on fixing software errors except "ASAP".

Data is available in the Enhanced Defect Report, updated daily on SBC's CLEC OnLine web site, which allows CLECs to assess the timeliness in which Software Errors are corrected.

Mean Time to Resolve OSS Defect Reports (DRs)

This PM is not consistent with any current process nor was it proposed as a modification to the 13-State Change Management document. There are no interval requirements surrounding resolution of DRs except "ASAP".

Data is available in the Enhanced Defect Report, updated daily on SBC's CLEC OnLine web site, which allows CLECs to assess the time required to resolve OSS Defect Reports. Potential exists for SBC to enhance this report to provide the data required to assess resolution timeliness of Non-CLEC Impacting DRs.

124. Measurement of Order Affected by Software Defects Not Resolved Within 48 Hours

SBC Midwest provides below redline edits that would need to be accepted by the CLECs in order to reach agreement on implementing the new version. Most of those edits are clarifications, rather than changing the fundamental manner in which the PM would be calculated.



"Clec Version of PM
124 by Tom Waterloc

SBC Proposals to Address CLEC Concerns

In addition to continuing to make the current reported data described above available to CLECs, SBC has identified the following actions that it could be willing to undertake to address concerns expressed by CLECs:

- ? Rejects in error, once verified, will be assigned a Severity 1 and be worked to resolution as Severity 1 according to the Change Management Process.
- ? A separate tab will be created in the Enhanced Defect Report to report out on Severity 1 Defects.
- ? SBC is willing to discuss the reporting enhancements identified above, and other reporting enhancements to current reports, with CLECs in order to provide CLECs the appropriate information needed to assess the Change Management Process.
- ? SBC is willing to discuss the CLEC concerns in the normal collaborative structure that is part of the Change Management Process.
- ? SBC Midwest is willing to consider implementation of the revised PM 124 in place of the current PM 124.

SBC Midwest believes none of the proposed PMs (beyond the revised PM 124) are appropriate due to 1) the lack of corresponding operational intervals that have been negotiated in the Change Management Process Drafting Team; 2) the availability to CLECs of data that provides them the ability to generate equivalent data to that requested in the PMs today (such data could be used by CLECs in the CMP collaboratives or in business-to-business discussions with SBC to address any concerns CLECs have); and 3) SBC's willingness to work on the additional proposals listed above.